Peter N. Wang (PW 9216) Robert A. Scher (RS 2910) Dana C. Rundlöf (DR 1431) FOLEY & LARDNER LLP 90 Park Avenue

New York, New York 10016 Telephone: (212) 682-7474 Facsimile: (212) 687-2329

pwang@foley.com
rscher@foley.com
drundlof@foley.com

Attorneys for Defendant Daicel Chemical Industries, Ltd.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CELANESE CORPORATION,

Plaintiff,

v.

DAICEL CHEMICAL INDUSTRIES, LTD., and POLYPLASTICS COMPANY, LTD.,

Defendants.

1:08-CV-06660 (SHS)

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Robert A. Scher, counsel for Defendant Daicel Chemical Industries, Ltd., and a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name:

Liane M. Peterson

Firm Name:

Foley & Lardner LLP

Address:

3000 K Street, N.W.

Suite 500

City/State/Zip:

Washington, DC 20007-5143

Phone Number:

(202) 945-6116

Fax Number:

(202) 672-5399

Liane M. Peterson is a member in good standing of the Bars of the State of Virginia and the District of Columbia, the United States District Court for the District of the District of Columbia, and the United States District Court for the Eastern District of Texas.

Dated: August 29, 2008 New York, New York

FOLEY & LARDNER LLP

Peter N. Wang (PW 9216)

Robert A. Scher (RS 2910) Dana C. Rundlöf (DR 1431)

90 Park Avenue

New York, NY 10016

Telephone: (212) 682-7474 Facsimile: (212) 687-2329

pwang@foley.com rscher@foley.com drundlof@foley.com

Attorneys for Defendant Daicel Chemical Industries, Ltd.

Peter N. Wang (PW 9216)
Robert A. Scher (RS 2910)
Dana C. Rundlöf (DR 1431)
FOLEY & LARDNER LLP
90 Park Avenue
New York, New York 10016
Telephone: (212) 682-7474
Facsimile: (212) 687-2329
pwang@foley.com
rscher@foley.com
drundlof@foley.com

Attorneys for Defendant Daicel Chemical Industries, Ltd.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	_
CELANESE CORPORATION, Plaintiff,	1:08-CV-06660 (SHS)
v. DAICEL CHEMICAL INDUSTRIES, LTD., and POLYPLASTICS COMPANY, LTD., Defendants.	AFFIDAVIT OF ROBERT A. SCHER IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE
STATE OF NEW YORK)) ss.:	
) ss.: COUNTY OF NEW YORK)	

Robert A Scher, being duly sworn, hereby deposes and says as follows:

- 1. I am a partner at Foley & Lardner LLP, counsel for defendant Daicel Chemical Industries, Ltd. ("Daicel") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion to admit Liane M. Peterson as counsel *pro hac vice* to represent Daicel in this matter.
- 2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in the State of New York in March, 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

- 3. Liane M. Peterson is an associate at Foley & Lardner LLP in Washington, DC.
- 4. Liane M. Peterson is a member in good standing of the Bars of the State of Virginia and the District of Columbia. She is also admitted to the bars of the United States District Court for the District of the District of Columbia, and the United States District Court for the Eastern District of Texas. She is in good standing with each of those courts. Certificates of Good Standing from the Bars of the State of Virginia and the District of Columbia are attached hereto as Exhibit A.
- 5. I understand Ms. Peterson to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure and the Local Rules of this Court. I know of no reason why Ms. Peterson should not be admitted *pro hac vice*.
- 6. Accordingly, I am pleased to move the admission of Liane M. Peterson, pro hac vice.
- 7. I respectfully request that the motion to admit Liane M. Peterson, *pro hac vice*, to represent Defendant Daicel Chemical Industries, Ltd., in the above-captioned matter, be granted. I respectfully submit a proposed order granting the admission of Liane M. Peterson, *pro hac vice*, which is attached hereto as Exhibit B.

Robert A. Scher (RS 2910)

Sworn to before me this 29 day of August, 2008

Notary Public, State of New York

LAUREL SANDLER
Notary Public, State of New York
No. 4768358
Qualified in Nassau County
Certificate Filed in Nassau County
Commission Expires Sept. 30, 20

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia, do hereby certify that

LIANE MARIE PETERSON

was admitted to practice as an attorney and counsellor at the bar of this Court on October 29, 2003.

I further certify that so far as the records of this office are concerned, LIANE MARIE PETERSON is a member of the bar of this Court in good standing.

Witness my hand and seal of said Court

This 12th day of August

A.D. 2008

Denuty Cleri



District of Columbia Court of Appeals Committee on Admissions 500 Indiana Avenue, N.W. — Room 4200 Washington, D. C. 20001 202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

LIANE M. PETERSON

WāS	on th	e _	9 ^{тн}		day of		JU	LY,	2004					
duly	y qual	ifi	ed	and	admitt	ted	as	an	atto	rney	and	coun	selor	anc
ent	itled	to	pr	actio	ce bef	ore	thi	Ls	Court	and	is,	on	the	date
indi	icated	bel	LOW,	an	active	men	ber	in	good	stand	ding	of th	nis Ba	ar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 11, 2008.

GARLAND PINKSTON, JR., CLERK

By: A.Chaulo
Deputy Clerk

/(1110---

Case 1:08-cv-06660-SHS Doci

Document 8 Filed 08/29/2008

Page 9 of 13

Peter N. Wang (PW 9216)

Robert A. Scher (RS 2910)

Dana C. Rundlöf (DR 1431)

FOLEY & LARDNER LLP

90 Park Avenue

New York, New York 10016

Telephone: (212) 682-7474

Facsimile: (212) 687-2329

pwang@foley.com
rscher@foley.com
drundlof@foley.com

Attorneys for Defendant Daicel Chemical Industries, Ltd.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CELANESE CORPORATION,

Plaintiff,

v.

DAICEL CHEMICAL INDUSTRIES, LTD., and POLYPLASTICS COMPANY, LTD.,

Defendants.

1:08-CV-06660 (SHS)

ORDER FOR ADMISSION OF COUNSEL PRO HAC VICE

Upon the motion of Robert A. Scher, attorney for Defendant Daicel Chemical Industries, Ltd. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Liane M. Peterson

Firm Name: Address:

Foley & Lardner LLP 3000 K Street, N.W.

Suite 500

City/State/Zip:

Washington, DC 20007-5143

Phone Number:

(202) 945-6116

Fax Number:

(202) 672-5399

is admitted to practice *pro hac vice* as counsel for Defendant Daicel Chemical Industries, Ltd., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court,

Page 10 of 13

including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: August____, 2008 New York, New York

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	v
CELANESE CORPORATION,	: :
Plaintiff,	: 1: 08-CV-06660 :
v.	: AFFIDAVIT : <u>OF SERVICE</u>
DAICEL CHEMICAL INDUSTRIES, LTD., and POLYPLASTICS COMPANY, LTD.,	; ; ;
Defendants	; ; ;
STATE OF NEW YORK)	X
) ss.: COUNTY OF NEW YORK)	

JOANNA KAHAN, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and resides at 366 12th Street, Brooklyn, NY 11215.

That on the 29th day of August, 2008, deponent served a copy of the Notice of Motion and Affidavit of Robert A. Scher in Support of Written Motion to Admit Liane M. Peterson *Pro Hac Vice* upon all counsel of record at their last address as follows via First Class Mail:

Daniel Bruce Goldman

Kasowitz, Benson, Torres & Friedman, LLP (NYC) 1633 Broadway New York, NY 10019 212-506-1708

Fax: 212-5414244

Email: dangoldman@paulhastings.com

Patrick D. Keating

Haynes and Boone, LLP 901 Main Street **Suite 3100** Dallas, TX 75202 (214) 651-5000 Fax: (214) 200-0494

Theodore G. Baroody

Haynes and Boone, LLP 901 Main Street **Suite 3100** Dallas, TX 75202 (214) 651-5108 Fax: (214) 200-0831

Liani Kotcher

Weil Gotshal & Manges 200 Crescent Court Suite 300 Dallas, TX 75201 (214) 746-8157

Steven Alan Reiss

Weil, Gotshal & Manges LLP (NYC) 767 Fifth Avenue New York, NY 10023 2123108000

2

Fax: 2128333148

Email: steven.reiss@weil.com

NYC_285488.1

Vance Loren Beagles

Weil, Gotshal & Manges 200 Crescent Court Suite 300 Dallas, TX 75201 (214) 746-7700

Fax: (214) 746-7777

Email: vance.beagles@weil.com

Sworn to before me this 29 day of August, 2008

Laurel Sandler

Notary Public, State of New York
No. 4768358
Qualified in Nassau County
Certificate Filed in Nassau County
Commission Expires Sept. 30, 20